

TODD A. ROBERTS (SBN 129722)  
 NICOLE S. HEALY (SBN 157417)  
 ROPERS, MAJESKI, KOHN & BENTLEY  
 1001 Marshall Street, Suite 500  
 Redwood City, CA 94063-2052  
 Telephone: (650) 364-8200  
 Facsimile: (650) 780-1701  
 Email: todd.roberts@rmkb.com  
 nicole.healy@rmkb.com

Attorneys for Defendants  
 TLC RESIDENTIAL, INC., a corporation, and  
 FRANCISCO MONTERO, an individual

UNITED STATES DISTRICT COURT  
 NORTHERN DISTRICT OF CALIFORNIA

THOMAS E. PEREZ, Secretary of Labor,  
 United States Department of Labor,

Plaintiff,

v.

TLC RESIDENTIAL, INC. a corporation, and  
 FRANCISCO MONTERO, an individual,

Defendants.

Case No. 15-cv-02776-WHA

~~PROPOSED~~ ORDER GRANTING  
 DEFENDANTS TLC RESIDENTIAL, INC.  
 AND FRANCISCO MONTERO'S  
 ADMINISTRATIVE MOTION TO FILE  
 DOCUMENTS IN SUPPORT OF MOTION  
 FOR SUMMARY JUDGMENT UNDER  
 SEAL PURSUANT TO L.R. 7-11 AND 79-5

Date: September 22, 2016

Time: 8:00 a.m.

Ctrm. 8 – 19<sup>th</sup> Floor

Judge: Hon. William H. Alsup

WHEREAS Defendants TLC Residential, Inc. and Francisco Montero filed an  
 Administrative Motion to File Documents Under Seal, pursuant to Civil Local Rules 7-11 and 79-  
 5, requesting leave to file unredacted versions of the following documents under seal:

Documents to be Publicly Filed in Redacted Form	Basis for Filing Unredacted Documents Under Seal
Portions of Notice of Motion and Motion for Summary Judgment; Memorandum of Points and Authorities in Support Thereof	Contains information identifying house parents and assistant house parents; confidential and proprietary TLC financial information
Portions of the Declarations of current and former TLC House Parents in Support of Defendants' Motion for Summary Judgment	Contains information identifying house parents and assistant house parents, as well as street addresses of TLC's sober living homes

Excerpts of the Transcript of Deposition of Pamela Davis	Contains information identifying house parents and assistant house parents
Names and street addresses in Exhibit 11 to the Declaration of Tammy House in Support of Defendants' Motion for Summary Judgment	Contains information identifying house parents and assistant house parents, as well as street addresses of TLC's sober living homes
Financial information in Exhibit 12 to the Declaration of Tammy House in Support of Defendants' Motion for Summary Judgment	Contains confidential and proprietary TLC financial information

**WHEREAS**, a compelling reason exists to permit Defendants to file under seal documents containing non-public information identifying TLC's current and former house parents, as well as the street addresses of TLC's sober living homes, and disclosing TLC's confidential and proprietary financial information; and

**WHEREAS**, Defendants have electronically filed redacted versions of the above documents with the Court; and

**WHEREAS**, Defendants will serve Counsel for Plaintiff Secretary of Labor with unredacted copies of Defendants' sealed documents by electronic mail;

**NOW THEREFORE, FOR GOOD CAUSE SHOWN, IT IS HEREBY ORDERED** that the foregoing unredacted documents filed in support of Defendants' Motion for Summary Judgment shall be filed under seal.

Dated: November 28, 2016.

HONORABLE WILLIAM H. ALSUP  
UNITED STATES DISTRICT JUDGE